

REMARKS

Below, the applicant's comments are preceded by related remarks of the examiner set forth in small bold font.

6. Claim 12 is objected to as being dependent on a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claim.

Regarding claim 12, nothing in the prior art of the record teaches or fairly suggests the service modules manipulate the resources according to one of a plurality of diverse protocols, in combination with the other limitations listed in the claim. In contrast, Coile only teaches the TCP protocol.

Amendments have been made. Claim 7 is now patentable. Claims 8-11 and 13 are patentable for at least the same reasons as claim 7. Claims that have been cancelled have been cancelled without prejudice or disclaimer.

The applicant notes that Coile discloses "although the embodiment described establishes connections to the Internet using TCP/IP, the present invention may also be used in conjunction with other protocols to connect to a LAN or WAN. In fact, some aspects of the invention may be employed with a connectionless protocol such as UDP." (col. 4, lines 37-42). However, Coile does not disclose or suggest that "each of the service modules manipulates one of the resources according to one of a plurality of diverse protocols."

1. Claims 1, 5, 7, 13, 14, 20, 21, 25, 26, 29, 31-33 and 39 are rejected under 35 USC 102(e) as being anticipated by Coile (US 6,298,063).

Regarding claims 1, 7, 14, 21, 26, 31 and 33, Coile teaches a method and apparatus for a computer telephony system (fig. 1).

The computer telephony platforms that have resources that provide computer telephony services (fig. 1, box 102, 104).

There are service modules (fig. 1, box 112, A, B, C) residing on each of the platforms (fig. 1, box 112) wherein the service modules manipulate the resources according to platform-dependent protocols to facilitate performance of computer telephony services for other service modules (TCP, col. 4, lines 14-15), and communication among service modules uses packets having a common, platform-independent protocol (col. 4, lines 23-25; col. 5, lines 55-56).

There are intra-platform packet routers (fig 1, box 200) residing on the platforms and configured to route message packets having intra-platform destination addresses (x.x.x.1-4) to local service modules (fig. 1, box 112), and route message packets having inter-platform destination addresses to an inter-platform platform interface (fig. 1, box 104).

There is inter-platform packet router (fig. 1, box 104) associated with the inter-platform interface, the inter-platform router routing message packets having inter-platform destination addresses (fig. 1, box 102) received from the intra-platform routers to one of the

intra-platform routers residing on one of the platforms on which the service modules indicated by the inter-platform address reside.

Regarding claims 5, 13, 20, 25, 29, 32, 39, the computer telephony services include voice, fax, data messaging, video and multi-media (TCP, col. 4, line 9).

Claim 1, as amended, recites "intra-platform packet routers residing on the platforms and configured to route message packets having intra-platform destination addresses to local service modules, including message packets originating from a platform on which an intra-platform packet router resides and having an intra-platform destination address to a service module residing on the platform." This feature is neither disclosed nor suggested by Coile.

Claims 14, 21, 26, 31, and 33 are patentable for at least the same reasons as amended claim 7.

Claims 5, 13, 20, 25, 29, 32, and 39 are patentable for at least the same reasons as the claims on which they depend.

3. Claims 2, 3, 8, 9, 15, 16, 22, 23, 27, 28 and 34-37 are rejected under 35 USC 103(a) as being unpatentable over Coile as applied to claims 1, 7 above, and further in view of Halsall.

The feature of claim 1 that is missing in Coile is also not disclosed or suggested by Halsall. Thus, claim 1, as well as claims 2 and 3, would not have been obvious in view of Coile and Halsall.

Claims 8, 9, 15, 16, 22, 23, 27, 28, and 34-37 are patentable for at least the same reasons as the claims on which they depend.

4. Claims 6, 11, 18, 30 and 40 are rejected under 35 USC 103(a) as being unpatentable over Coile as applied to claims 1, 7, 14, 26 and 33 above, and further in view of McConnell (US 6,108,307).

The feature of claim 1 that is missing in Coile is also not disclosed or suggested by McConnell. Thus, claim 1, as well as claim 6, would not have been obvious in view of Coile and McConnell.

Claims 11, 18, 30, and 40 are patentable for at least the same reasons as the claims on which they depend.

5. Claims 4, 10, 17, 24, and 38 are rejected under 35 USC 103(a) as being unpatentable over Coile as applied to claims 1, 7, 14, 21 and 33 above, and further in view of Killian (US 6,064,671).

The feature of claim 1 that is missing in Coile is also not disclosed or suggested by Killian. Thus, claim 1, as well as claim 4, would not have been obvious in view of Coile and Killian.

Claims 10, 17, 24, and 38 are patentable for at least the same reasons as the claims on which they depend.

The fact that the applicant has stated arguments in response to positions of the examiner does not mean that the applicant concedes any other positions of the examiner. The fact that the applicant or the examiner has stated certain reasons for the patentability of certain claims does not mean that there are not other good reasons for the patentability of those claims or other claims.

20617127.doc